

# Cumberland City Utilities

PO Box 40

Cumberland City, TN 37050

Phone (931) 827-2000

Fax (931) 827-2395

TN0025119  
HVA

Mr. Hari Akunuri  
TDEC – Water Pollution Control – NPDES Permit Section  
401 Church Street  
6<sup>th</sup> Floor, L&C Annex  
Nashville, TN 37243-1534

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DEC 09 2011

TN Division Of Water  
Pollution Control

Re: NPDES Permit No. TN0025119 Modification Request  
Cumberland City Lagoon – Cumberland City

Mr. Akunuri,

During a recent compliance inspection by Ms Ann E. Rochelle with Nashville TDEC, it was pointed out that some of the required parameters of the new permit have changed from the requirements of the previous permit. We, the Town of Cumberland City, had failed to recognize these changes and should have appealed the draft permit which was sent in April 2010. During this time we had an unexpected turnover of our Utility Manager and failed to recognize the changes in the new permit.

I am requesting a permit modification; that the following parameters in the current permit be changed back to the old permit parameter language:

1. BOD *effluent* sample type changed from composite back to a grab sample.
2. Suspended Solids effluent sample type changed from composite back to a grab sample.
3. Settleable solids effluent grab sample measurement frequency changed from 5/week back to 2/week.
4. pH effluent grab sample measurement frequency changed from 5/week back to 2/week.
5. Flow measurement sampling point changed from influent to effluent sampling point.

The effluent sampling point is where readings have been taken all along.

Ms Rochelle, with Nashville TDEC, was in agreement that we should request a modification to the current permit for the above mentioned parameters in her compliance follow up letter. The Town of Cumberland City uses a two celled aerated lagoon to treat domestic wastewater from 115 customers. The effluent is very consistent regarding parameters' measured and analyzed. Please take this into consideration when reviewing our request for the modification of our NPDES permit.

If you need clarification of any of these requests or any further information, feel free to contact me or Mike Perrigo, our current Director of Public Works.

Sincerely,

A handwritten signature in cursive script that reads "Gary 'Whitey' Vaughn". The signature is fluid and stylized, with the first name "Gary" and the nickname "'Whitey'" clearly legible, followed by the last name "Vaughn".

Gary "Whitey" Vaughn  
Mayor of Cumberland City

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T&E Division Of Water  
Pollution Control